

**Data Protection Notice  
of CETIN Hungary Zrt.**

on the recording and use of certain telephone conversations with existing partners in  
connection with the property rental relationship

**CETIN Hungary Zártkörűen Működő Részvénytársaság** (company registration number: 13-10-042052, tax number: 27926392-2-13, registered office: 2045 Törökbálint, Pannon út 1., hereinafter referred to as the '**Data Controller**'), as the data controller, hereby informs its partners, as lessors - in connection with the matters related to the lease contract with the Data Controller as the lessee - as data subjects about the data processing activities carried out by the Data Controller as detailed below.

A Data Protection Officer (hereinafter referred to as the '**Data Protection Officer**') is employed by the Data Controller:

Name: dr. István Tamás Szabó lawyer;  
Registered office: 1132 Budapest, Váci út 18. IV. emelet;  
E-mail: [szabo@istvantamas.hu](mailto:szabo@istvantamas.hu);  
Telephone: +3630 631 3653

The Data Controller informs its partners that it makes voice recordings (hereinafter '**Data**') of those telephone calls (hereinafter '**Telephone Conversations**') which are related to its partners' rental agreements.

As the Data Controller respects the rights of the data subjects to audio recordings as personal data, it provides detailed information on its data management activities in this Data Protection Notice.

The *legal basis for the data processing* is the legitimate interests of the Data Controller, including the activities of the Data Controller, the consumer protection and the quality assurance policies of the Data Controller, in particular, the provision of adequate customer service by the Data Controller.

The *purpose of the data processing* is to comply with the Data Controller's consumer protection and quality assurance policies, in particular, to ensure the provision of adequate customer service by the Data Controller.

The *scope of the personal data processed* is the entire telephone conversation with the data subject as well as all personal data collected during that conversation.

The *period of the data processing* is 3 (three) years from the date of recording the Data.

The Data Controller *does not make automated decisions and does not perform profiling*, does not use any other *data processor* in connection with the activity and *does not transfer the data to third parties*.

The Data Controller declares that it takes appropriate measures to ensure the security of the data in compliance with the applicable legislation. To this end, it takes the technical and organisational measures and establishes the internal rules of procedure necessary to achieve the above objective.

I. Protection of Data

The Data Controller protects the data against unauthorised access, alteration, transmission, disclosure other than that provided for in this notice, deletion or destruction,

accidental destruction or accidental damage and inaccessibility resulting from changes in the technology used, by applying a high level of expertise and precautions.

When defining and applying data security measures, the Data Controller takes into account the security of the technology that can be used and provides for the use of the most appropriate data processing solution available to it which ensures the highest level of protection of personal data.

## II. Rights and remedies available to the data subject

The Data Controller informs its partners that, pursuant to Article 13(2)(b) of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council), the data subject may exercise the following rights, free from any influence or restriction by the employer:

- request access to personal data concerning him or her from the Data Controller,
- propose the rectification, erasure or restriction of the processing of the data,
- expressly object to the processing of personal data,
- withdraw his or her consent to the processing given either implicitly or in writing in person.

The partners affected by the processing have the right to lodge a complaint against the Data Controller with the National Authority for Data Protection and Freedom of Information ([www.naih.hu](http://www.naih.hu)) and to initiate proceedings against the data processing, and the data subject whose rights have been infringed may also bring the matter before a court of competent jurisdiction in the context of litigation.

This Data Protection Notice shall be read in accordance with the Data Controller's Data Protection Policy in force at all times. For further information on data processing, please contact the Data Protection Officer of CETIN Hungary Zrt. at the contact details provided above.

**CETIN Hungary Zrt.**  
Judit Kübler-Andrási  
Chief Executive Officer